

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
JOHN AND DONNA MARINO : CHAPTER 13
Debtors. :

US BANK NA as Legal Title Trustee for :
Truman 2016 SC6 Title Trust :
Movant, :
: :
vs. :
JOHN AND DONNA MARINO : CASE NO. 5-20-03437
Respondents. :

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party(parties). This is a first request for a continuance

Reason for continuance: Debtors are incarcerated and Debtor's Counsel needs additional time to contact the Debtors to ascertain their intentions regarding the property and the Bankruptcy case. The parties request that the hearing be continued to the next available Chapter 13 date.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: February 9, 2022

/s/Tullio DeLuca
Attorney for John and Donna Marino
Name: Tullio DeLuca, Esq.
Phone No. (570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 9, 2022, he caused a true and correct copy of Debtors' Request to Continue Hearing/Trial to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Emmanuel J. Argentieri, Esq. at eargentieri@rgalegal.com

Date of Mailing: February 9, 2022

/s/Tullio DeLuca
Tullio DeLuca, Esquire